

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

I. (a) PLAINTIFFS

CARYOLYN THOMAS

(b) County of Residence of First Listed Plaintiff _____

(c) Attorney's (Firm Name, Address, Telephone Number and Email Address)

Craig Thor Kimmel, Esquire
Kimmel & Silverman, P.C.
30 E. Butler Pike
Ambler, PA 19002
(215) 540-8888

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

<input type="checkbox"/> 1 U.S. Government Plaintiff	<input checked="" type="checkbox"/> 3 Federal Question (U.S. Government Not a Party)
<input type="checkbox"/> 2 U.S. Government Defendant	<input type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

	PTF	DEF	PTF	DEF
Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business In This State	<input type="checkbox"/> 4 <input type="checkbox"/> 4
Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business In Another State	<input type="checkbox"/> 5 <input type="checkbox"/> 5
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6 <input type="checkbox"/> 6

IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance	PERSONAL INJURY	PERSONAL INJURY	PROPERTY RIGHTS	<input type="checkbox"/> 400 State Reapportionment
<input type="checkbox"/> 120 Marine	<input type="checkbox"/> 310 Airplane	<input type="checkbox"/> 362 Personal Injury - Med. Malpractice	<input type="checkbox"/> 422 Appeal 28 USC 158	<input type="checkbox"/> 410 Antitrust
<input type="checkbox"/> 130 Miller Act	<input type="checkbox"/> 315 Airplane Product Liability	<input type="checkbox"/> 365 Personal Injury - Product Liability	<input type="checkbox"/> 423 Withdrawal 28 USC 157	<input type="checkbox"/> 430 Banks and Banking
<input type="checkbox"/> 140 Negotiable Instrument	<input type="checkbox"/> 320 Assault, Libel & Slander	<input type="checkbox"/> 368 Asbestos Personal Injury Product Liability		<input type="checkbox"/> 450 Commerce
<input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment	<input type="checkbox"/> 330 Federal Employers' Liability	<input type="checkbox"/> 370 Other Fraud		<input type="checkbox"/> 460 Deportation
<input type="checkbox"/> 151 Medicare Act	<input type="checkbox"/> 340 Marine	<input type="checkbox"/> 371 Truth in Lending		<input checked="" type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations
<input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans)	<input type="checkbox"/> 345 Marine Product Liability	<input type="checkbox"/> 380 Other Personal Property Damage		<input type="checkbox"/> 480 Consumer Credit
<input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits	<input type="checkbox"/> 350 Motor Vehicle	<input type="checkbox"/> 385 Property Damage Product Liability		<input type="checkbox"/> 490 Cable/Sat TV
<input type="checkbox"/> 160 Stockholders' Suits	<input type="checkbox"/> 355 Motor Vehicle Product Liability			<input type="checkbox"/> 810 Selective Service
<input type="checkbox"/> 190 Other Contract	<input type="checkbox"/> 360 Other Personal Injury			<input type="checkbox"/> 850 Securities/Commodities/ Exchange
<input type="checkbox"/> 195 Contract Product Liability				<input type="checkbox"/> 875 Customer Challenge 12 USC 3410
<input type="checkbox"/> 196 Franchise				<input type="checkbox"/> 890 Other Statutory Actions
REAL PROPERTY	CIVIL RIGHTS	PRISONER PETITIONS	SOCIAL SECURITY	<input type="checkbox"/> 891 Agricultural Acts
<input type="checkbox"/> 210 Land Condemnation	<input type="checkbox"/> 441 Voting	<input type="checkbox"/> 510 Motions to Vacate Sentence	<input type="checkbox"/> 861 HIA (1395ff)	<input type="checkbox"/> 892 Economic Stabilization Act
<input type="checkbox"/> 220 Foreclosure	<input type="checkbox"/> 442 Employment	Habeas Corpus:	<input type="checkbox"/> 862 Black Lung (923)	<input type="checkbox"/> 893 Environmental Matters
<input type="checkbox"/> 230 Rent Lease & Ejectment	<input type="checkbox"/> 443 Housing/ Accommodations	<input type="checkbox"/> 530 General	<input type="checkbox"/> 863 DIWC/DIWW (405(g))	<input type="checkbox"/> 894 Energy Allocation Act
<input type="checkbox"/> 240 Torts to Land	<input type="checkbox"/> 444 Welfare	<input type="checkbox"/> 535 Death Penalty	<input type="checkbox"/> 864 SSID Title XVI	<input type="checkbox"/> 895 Freedom of Information Act
<input type="checkbox"/> 245 Tort Product Liability	<input type="checkbox"/> 445 Amer. w/Disabilities - Employment	<input type="checkbox"/> 540 Mandamus & Other	<input type="checkbox"/> 865 RSI (405(g))	<input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice
<input type="checkbox"/> 290 All Other Real Property	<input type="checkbox"/> 446 Amer. w/Disabilities - Other	<input type="checkbox"/> 550 Civil Rights		<input type="checkbox"/> 950 Constitutionality of State Statutes
	<input type="checkbox"/> 440 Other Civil Rights	<input type="checkbox"/> 555 Prison Condition		

V. ORIGIN

(Place an "X" in One Box Only)

<input checked="" type="checkbox"/> 1 Original Proceeding	<input type="checkbox"/> 2 Removed from State Court	<input type="checkbox"/> 3 Remanded from Appellate Court	<input type="checkbox"/> 4 Reinstated or Reopened	<input type="checkbox"/> 5 Transferred from another district (specify) _____	<input type="checkbox"/> 6 Multidistrict Litigation	<input type="checkbox"/> 7 Appeal to District Judge from Magistrate Judgment
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Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

15 U.S.C SECTION 1692

VI. CAUSE OF ACTION

Brief description of cause:
Fair Debt Collection Practices Act

VII. REQUESTED IN COMPLAINT:

 CHECK IF THIS IS A CLASS ACTION
UNDER F.R.C.P. 23

DEMAND \$ _____

CHECK YES only if demanded in complaint:
JURY DEMAND: Yes No

VIII. RELATED CASE(S)

(See instructions):

JUDGE _____

DOCKET NUMBER _____

Explanation:

10-13-11

/S/ CRAIG THOR KIMMEL

DATE

SIGNATURE OF ATTORNEY OF RECORD

FOR THE EASTERN DISTRICT OF PENNSYLVANIA — DESIGNATION FORM to be used by counsel to indicate the category of the case for the purpose of assignment to appropriate calendar.

Address of Plaintiff: 7453 Charlestown Road, Mercersburg PA 17236

Address of Defendant: 501 Prudential Road, Horsham PA 19044

Place of Accident, Incident or Transaction:

(Use Reverse Side For Additional Space)

Does this civil action involve a nongovernmental corporate party with any parent corporation and any publicly held corporation owning 10% or more of its stock?

(Attach two copies of the Disclosure Statement Form in accordance with Fed.R.Civ.P. 7.1(a))

Yes No

Does this case involve multidistrict litigation possibilities?

Yes No

RELATED CASE, IF ANY:

Case Number: _____ Judge _____ Date Terminated: _____

Civil cases are deemed related when yes is answered to any of the following questions:

1. Is this case related to property included in an earlier numbered suit pending or within one year previously terminated action in this court?

Yes No

2. Does this case involve the same issue of fact or grow out of the same transaction as a prior suit pending or within one year previously terminated action in this court?

Yes No

3. Does this case involve the validity or infringement of a patent already in suit or any earlier numbered case pending or within one year previously terminated action in this court?

Yes No

4. Is this case a second or successive habeas corpus, social security appeal, or pro se civil rights case filed by the same individual?

Yes No

CIVIL: (Place in ONE CATEGORY ONLY)

A. *Federal Question Cases:*

1. Indemnity Contract, Marine Contract, and All Other Contracts

B. *Diversity Jurisdiction Cases:*

1. Insurance Contract and Other Contracts

2. FELA

2. Airplane Personal Injury

3. Jones Act-Personal Injury

3. Assault, Defamation

4. Antitrust

4. Marine Personal Injury

5. Patent

5. Motor Vehicle Personal Injury

6. Labor-Management Relations

6. Other Personal Injury (Please

7. Civil Rights

specify)

8. Habeas Corpus

7. Products Liability

9. Securities Act(s) Cases

8. Products Liability — Asbestos

10. Social Security Review Cases

9. All other Diversity Cases

(Please specify)

11. All other Federal Question Cases

15 U.S.C. §1692

(Please specify)

ARBITRATION CERTIFICATION

(Check Appropriate Category)

I, Craig Tharkimmel, counsel of record do hereby certify:

Pursuant to Local Civil Rule 53.2, Section 3(c)(2), that to the best of my knowledge and belief, the damages recoverable in this civil action case exceed the sum of \$150,000.00 exclusive of interest and costs;

Relief other than monetary damages is sought.

DATE: 10-13-11

Attorney-at-Law

Craig Tharkimmel

57100

Attorney I.D.#

NOTE: A trial de novo will be a trial by jury only if there has been compliance with F.R.C.P. 38.

I certify that, to my knowledge, the within case is not related to any case now pending or within one year previously terminated action in this court except as noted above.

DATE: 10-13-11

Attorney-at-Law

Craig Tharkimmel

57100

Attorney I.D.#

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

CASE MANAGEMENT TRACK DESIGNATION FORM

Carolyn A. Thomas : CIVIL ACTION
v. :
NCO Financial Systems, Inc. : NO.

In accordance with the Civil Justice Expense and Delay Reduction Plan of this court, counsel for plaintiff shall complete a Case Management Track Designation Form in all civil cases at the time of filing the complaint and serve a copy on all defendants. (See § 1:03 of the plan set forth on the reverse side of this form.) In the event that a defendant does not agree with the plaintiff regarding said designation, that defendant shall, with its first appearance, submit to the clerk of court and serve on the plaintiff and all other parties, a Case Management Track Designation Form specifying the track to which that defendant believes the case should be assigned.

SELECT ONE OF THE FOLLOWING CASE MANAGEMENT TRACKS:

(a) Habeas Corpus – Cases brought under 28 U.S.C. § 2241 through § 2255. ()

(b) Social Security – Cases requesting review of a decision of the Secretary of Health and Human Services denying plaintiff Social Security Benefits. ()

(c) Arbitration – Cases required to be designated for arbitration under Local Civil Rule 53.2. (X)

(d) Asbestos – Cases involving claims for personal injury or property damage from exposure to asbestos. ()

(e) Special Management – Cases that do not fall into tracks (a) through (d) that are commonly referred to as complex and that need special or intense management by the court. (See reverse side of this form for a detailed explanation of special management cases.) ()

(f) Standard Management – Cases that do not fall into any one of the other tracks. ()

10-13-11

Date

215-5410-8888

Telephone

Gary Thor Kimmel
Attorney-at-law

877-788-2864

FAX Number

Carolyn A. Thomas
Attorney for

Kimmel@creditlaw.com

E-Mail Address

UNITED STATES DISTRICT COURT
FOR THE
EASTERN DISTRICT OF PENNSYLVANIA

CAROLYN A. THOMAS,)
Plaintiff)
v.)
NCO FINANCIAL SYSTEMS, INC.,) Case No.:
Defendant)
)
) COMPLAINT AND DEMAND FOR
) JURY TRIAL
)
) (Unlawful Debt Collection Practices)

COMPLAINT

CAROLYN A. THOMAS, ("Plaintiff"), by her attorneys, KIMMEL & SILVERMAN, P.C., alleges the following against NCO FINANCIAL SYSTEMS, INC. ("Defendant"):

INTRODUCTION

1. Plaintiff's Complaint is based on the Fair Debt Collection Practices Act, 15 U.S.C. § 1692 *et seq.* ("FDCPA").

JURISDICTION AND VENUE

2. Jurisdiction of this court arises pursuant to 15 U.S.C. § 1692k(d), which states that such actions may be brought and heard before “any appropriate United States district court without regard to the amount in controversy,” and 28 U.S.C. § 1331 grants this court original jurisdiction of all civil actions arising under the laws of the United States.

3. Defendant has its corporate headquarters in the Commonwealth of Pennsylvania and as such, personal jurisdiction is established.

4. Venue is proper pursuant to 28 U.S.C. § 1391(b)(1).

PARTIES

5. Plaintiff is a natural person residing in Mercersburg, Pennsylvania.

6. Plaintiff is a "consumer" as that term is defined by 15 U.S.C. § 1692a(3).

7. Defendant is a national debt collection company with its corporate headquarters at 507 Prudential Road, Horsham, PA 19044.

8. Defendant is a "debt collector" as that term is defined by 15 U.S.C. § 1692a(6).

9. Defendant acted through its agents, employees, officers, members, directors, successors, assigns, principals, trustees, sureties, subrogees, representatives, and insurers.

PRELIMINARY STATEMENT

10. The Fair Debt Collection Practices Act (“FDCPA”) is a comprehensive statute, which prohibits a catalog of activities in connection with the collection of debts by third parties. See 15 U.S.C. § 1692 *et seq.* The FDCPA imposes civil liability on any person or entity that violates its provisions, and establishes general standards of debt collector conduct, defines abuse, and provides for specific consumer rights. 15 U.S.C. § 1692k.

11. The operative provisions of the FDCPA declare certain rights to be provided to or claimed by debtors, forbid deceitful and misleading practices, prohibit harassing and abusive tactics, and proscribe unfair or unconscionable conduct, both generally and in a specific list of disapproved practices.

12. In particular, the FDCPA broadly enumerates several practices considered contrary to its stated purpose, and forbids debt collectors from taking such action. The substantive heart of the FDCPA lies in three broad prohibitions. First, a “debt collector may not engage in any conduct the natural consequence of which is to harass, oppress, or abuse any person in connection with the collection of a debt.” 15 U.S.C. § 1692d. Second, a “debt

1 collector may not use any false, deceptive, or misleading representation or means in connection
 2 with the collection of any debt.” 15 U.S.C. § 1692e. And third, a “debt collector may not use
 3 unfair or unconscionable means to collect or attempt to collect any debt.” 15 U.S.C. § 1692f.
 4 The FDCPA is designed to protect consumers from unscrupulous collectors, whether or not there
 5 exists a valid debt, broadly prohibits unfair or unconscionable collection methods, conduct which
 6 harasses, oppresses or abuses any debtor, and any false, deceptive or misleading statements in
 7 connection with the collection of a debt.

8 13. In enacting the FDCPA, the United States Congress found that “[t]here is
 9 abundant evidence of the use of abusive, deceptive, and unfair debt collection practices by many
 10 debt collectors,” which “contribute to the number of personal bankruptcies, to marital instability,
 11 to the loss of jobs, and to invasions of individual privacy.” 15 U.S.C. § 1692a. Congress
 12 additionally found existing laws and procedures for redressing debt collection injuries to be
 13 inadequate to protect consumers. 15 U.S.C. § 1692b.

14 14. Congress enacted the FDCPA to regulate the collection of consumer debts by debt
 15 collectors. The express purposes of the FDCPA are to “eliminate abusive debt collection
 16 practices by debt collectors, to insure that debt collectors who refrain from using abusive debt
 17 collection practices are not competitively disadvantaged, and to promote consistent State action
 18 to protect consumers against debt collection abuses.” 15 U.S.C. § 1692e.
 19

20 FACTUAL ALLEGATIONS

21 15. At all relevant times, Defendant was attempting to collect an alleged debt from
 22 Plaintiff originally owed to Verizon Wireless.
 23

24 16. The debt arose out of transactions that were primarily for personal, family, or
 25 household purposes.

1 17. Beginning on or about April 1, 2011, and continuing through September 12,
2 2011, Defendant continuously and repeatedly contacted Plaintiff in an attempt to collect a debt.

3 18. Defendant contacted Plaintiff, on average, two (2) times a day, sometimes calling
4 Plaintiff as frequently as three (3) times a day.

5 19. In addition to calling Plaintiff, Defendant left messages on her answering
6 machine, leaving pre-recorded messages.

7 20. Plaintiff received telephone calls from (800) 788-7870, which the undersigned
8 has confirmed is a telephone number belonging to Plaintiff.

9 21. Defendant's continuous and repetitive calls were upsetting and stressful for
10 Plaintiff to receive, as Plaintiff is an elderly woman.

12 22. Plaintiff informed Defendant that she was elderly, that its telephone calls were
13 extremely upsetting, and instructed Defendant to stop contacting her about the alleged debt.

14 23. Despite Plaintiff's instructions to stop contacting her, Defendant continued to
15 contact Plaintiff seeking and demanding payment of an alleged debt.

16 24. Upon information and belief, Defendant's intent when contacting Plaintiff
17 continuously and repeatedly was to harass Plaintiff into paying the alleged debt.

18 25. Further, when Defendant spoke to Plaintiff, Defendant made derogatory
19 statements to Plaintiff to harass and humiliate her.

21 26. In one instance, Defendant's employee, identifying himself to Plaintiff as "Tim
22 W.," told Plaintiff, "you racked up the debt and now you need to pay it!"

23 27. Finally, on or about April 30, 2011, Defendant sent Plaintiff seeking and
24 demanding payment of \$708.02. See Exhibit A, Defendant's April 30, 2011 letter.

25 28. Upon information and belief, Defendant sought to collect an amount more than

1 the amount which the original creditor claimed was due and owing.

2 CONSTRUCTION OF APPLICABLE LAW

3 29. The FDCPA is a strict liability statute. Taylor v. Perrin, Landry, deLaunay &
 4 Durand, 103 F.3d 1232 (5th Cir. 1997). “Because the Act imposes strict liability, a consumer
 5 need not show intentional conduct by the debt collector to be entitled to damages.” Russell v.
 6 Equifax A.R.S., 74 F. 3d 30 (2d Cir. 1996); see also Gearing v. Check Brokerage Corp., 233
 7 F.3d 469 (7th Cir. 2000) (holding unintentional misrepresentation of debt collector’s legal status
 8 violated FDCPA); Clomon v. Jackson, 988 F. 2d 1314 (2d Cir. 1993).

9 30. The FDCPA is a remedial statute, and therefore must be construed liberally in
 10 favor of the debtor. Sprinkle v. SB&C Ltd., 472 F. Supp. 2d 1235 (W.D. Wash. 2006). The
 11 remedial nature of the FDCPA requires that courts interpret it liberally. Clark v. Capital Credit
 12 & Collection Services, Inc., 460 F. 3d 1162 (9th Cir. 2006). “Because the FDCPA, like the
 13 Truth in Lending Act (TILA) 15 U.S.C §1601 *et seq.*, is a remedial statute, it should be
 14 construed liberally in favor of the consumer.” Johnson v. Riddle, 305 F. 3d 1107 (10th Cir.
 15 2002).

16 31. The FDCPA is to be interpreted in accordance with the “least sophisticated”
 17 consumer standard. See Jeter v. Credit Bureau, Inc., 760 F.2d 1168 (11th Cir. 1985); Graziano
 18 v. Harrison, 950 F. 2d 107 (3rd Cir. 1991); Swanson v. Southern Oregon Credit Service, Inc.,
 19 869 F.2d 1222 (9th Cir. 1988). The FDCPA was not “made for the protection of experts, but for
 20 the public - that vast multitude which includes the ignorant, the unthinking, and the credulous,
 21 and the fact that a false statement may be obviously false to those who are trained and
 22 experienced does not change its character, nor take away its power to deceive others less
 23 experienced.” Id. The least sophisticated consumer standard serves a dual purpose in that it
 24
 25

1 ensures protection of all consumers, even naive and trusting, against deceptive collection
2 practices, and protects collectors against liability for bizarre or idiosyncratic interpretations of
3 collection notices. Clomon, 988 F. 2d at 1318.

4

5 **COUNT I**
6 **DEFENDANT VIOLATED THE**
7 **FAIR DEBT COLLECTION PRACTICES ACT**

8 32. In its actions to collect a debt, Defendant violated the FDCPA in one or more of
9 the following ways:

10 a. Defendant violated the FDCPA generally;

11 b. Defendant violated §1692c(a)(1) of the FDCPA when it communicated with
12 Plaintiff at a time or place that or knew or should have known to be
13 inconvenient;

14 c. Defendant violated §1692d of the FDCPA when it harassed, oppressed or
15 abused Plaintiff in connection with the collection of a debt;

16 d. Defendant violated §1692d(2) of the FDCPA when it used language the
17 natural consequences of which was to abuse Plaintiff;

18 e. Defendant violated §1692d(5) of the FDCPA when it caused Plaintiff's
19 telephone to ring repeatedly or continuously with the intent to annoy, abuse or
20 harass;

21 f. Defendant violated §1692e of the FDCPA when it used false, deceptive, and
22 misleading representations in connection with the collection of a debt;

23 g. Defendant violated §1692e(2)(A) of the FDCPA when it falsely represented
24 the character, amount or legal status of the debt;

25 h. Defendant violated §1692e(10) of the FDCPA when it used false and

deceptive means in attempting to collect a debt; and

- i. Defendant violated §1692f of the FDCPA when it used unfair and unconscionable means in connection with the collection of a debt.

WHEREFORE, Plaintiff, CAROLYN A. THOMAS, respectfully prays for a judgment as follows:

- a. All actual damages suffered pursuant to 15 U.S.C. § 1692k(a)(1);
- b. Statutory damages of \$1,000.00 for the violation of the FDCPA pursuant to 15 U.S.C. § 1692k(a)(2)(A);
- c. All reasonable attorneys' fees, witness fees, court costs and other litigation costs incurred by Plaintiff pursuant to 15 U.S.C. § 1693k(a)(3); and
- d. Any other relief deemed appropriate by this Honorable Court.

DEMAND FOR JURY TRIAL

PLEASE TAKE NOTICE that Plaintiff, CAROLYN A. THOMAS, demands a jury trial in this case.

RESPECTFULLY SUBMITTED,

CTK365L

Craig Thor Kimmel
Attorney ID #57100
Kimmel & Silverman, P.C.
30 E. Butler Pike
Ambler, PA 19002
Phone: (215) 540-8888
Fax: (877) 788-2864
Email: kimmel@creditlaw.com

PO BOX 15630
DEPT 15
WILMINGTON DE 19850



Calls to or from this company may be monitored
or recorded for quality assurance.

UJU309
CAROLYN A THOMAS

8188-1705

NCO FINANCIAL SYSTEMS, INC.

507 Prudential Road, Horsham, PA 19044

800-788-7870

OFFICE HOURS(ET):

8AM-9PM MON THRU THURSDAY

8AM-5PM FRIDAY

9AM-1PM SATURDAY

Apr 30, 2011

CREDITOR: VERIZON WIRELESS

CREDITOR'S ACCOUNT #: 061962377000001

REGARDING: PAST DUE BALANCE

CURRENT BALANCE DUE: \$ 708.02

|||||

The named creditor has placed this account with our office for collection.

If you choose not to respond to this notification, we will assign your account to a collector with instructions to collect this balance.

Send payment in full to the address listed below.

Unless you notify this office within 30 days after receiving this notice that you dispute the validity of the debt or any portion thereof this office will assume this debt is valid. If you notify this office in writing within 30 days from receiving this notice, this office will obtain verification of the debt or obtain a copy of a judgement and mail you a copy of such judgement or verification. If you request this office in writing within 30 days after receiving this notice, this office will provide you with the name and address of the original creditor, if different from the current creditor.

This is an attempt to collect a debt. Any information obtained will be used for that purpose. This is a communication from a debt collector.

Your account balance may be periodically increased due to the addition of accrued interest or other charges as provided in your agreement with the original creditor or as otherwise provided by state law.

... PLEASE RETURN THIS PORTION WITH YOUR PAYMENT (MAKE SURE ADDRESS SHOWS THROUGH WINDOW) ...

Our Account #	Current Balance Due
UJU309	\$ 708.02

CAROLYN A THOMAS



\$



Make Payment To:

|||||

NCO FINANCIAL SYSTEMS

PO BOX 15391

WILMINGTON, DE 19850-5391

NCOP 3:
1706

0115000UJU30990000000200000000000708024